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January 20, 2023

Hon. Naomi Reice Buchwald  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *USA v Angel Hernandez*, 22 Cr. 702 (NRB)

Your Honor:

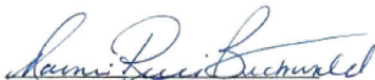
I write to ask that this Court grant permission for my client, Angel Hernandez, to travel and attend one event on January 22, 2023. Since his arrest about one month ago, Mr. Hernandez has been on home detention, living with his mother in the Bronx. Mr. Hernandez, who is 18 years old, has been in full compliance with the conditions of his bond. He would now like to travel from his home this Sunday so that he can attend the birthday party for his niece, who is turning one-year old. The party is occurring at a venue in the Bronx – about 20 minutes from Mr. Hernandez's home – and will be primarily attended by family. In order to attend the party, Mr. Hernandez would need permission to leave his home around 4:30 p.m., with the understanding that he would return home by around 9 p.m.

I have conferred with his pre-trial services officer and the government. Neither pre-trial services nor the government takes a position regarding this application.

Accordingly, we ask that this Court grant Mr. Hernandez permission to leave his home at 4:30 p.m. on January 22, 2023, travel to a birthday party in the Bronx, and return home by 9:30 p.m.

In the future, any bail modification applications should be submitted at least five business days in advance of the requested modification.

**SO ORDERED.**

  
NAOMI REICE BUCHWALD  
UNITED STATES DISTRICT JUDGE

Dated: New York, New York  
January 23, 2023

Respectfully submitted,

/s/  
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James E. Neuman